

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE AND FEE CHANGES
DOCKET NO. R97-1

UNITED STATES POSTAL SERVICE
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW
(USPS/OCA-T500-37-41)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to Office of the Consumer Advocate witness Callow: USPS/OCA-T500-37-41.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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February 4, 1998

USPS/OCA-T500-37. Please refer to your response to interrogatory USPS/OCA-T500-13. Please confirm that **the current** post office box service fees are based (in part) on post office costs, but not on post office revenues. If you do not confirm, please explain why not.

USPS/OCA-T500-38. Please refer to your response to interrogatory USPS/OCA-T500-14(a), which quotes the Postal Service concerning CAG A, B, K, and L offices. Does the designation of an office as CAG C through CAG J reveal anything about that office's location. If so, please explain what.

USPS/OCA-T500-39. Please refer to your response to USPS/OCA-T500-14(b), where you state that revenues can be used to indicate an office's size.

- (a) Is it possible for a small office to generate a relatively large amount of revenue? If your answer is other than yes, please explain why this is not possible.
- (b) Is it possible for a large office to generate a relatively small amount of revenue? If your answer is other than yes, please explain why this is not possible.
- (c) Please confirm that for small offices that have a relatively high number of revenue units and for large offices that have a relatively low number of revenue units, CAG designation would not be a reliable indicator of office size. If you do not confirm, please explain why?

USPS/OCA-T500-40. Please refer to your response to interrogatory USPS/OCA-T500-14(c). What is the basis of your understanding that the CAG level of an office is highly correlated with each of the following:

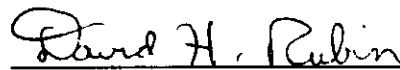
- (a) the costs for that office;
- (b) the number of employees for that office;
- (c) the size of the facility;
- (d) the volume of incoming mail processed for that office?

In answering for each of items (a)-(d), please identify any data, including data averaged by CAG, that support your response.

USPS/OCA-T500-41. Please refer to your response to interrogatory USPS/OCA-T500-15(a), where you state that, at the time that you developed your cost methodology, you had no other basis for allocating post office box window service costs to offices in which there are no mailhandlers and supervisors. Do you now have any other basis for allocating these costs? If so, please present that alternative basis for allocating costs.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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